

November 12, 1982

Memo to Coal File:

RE: Wildhorse Ridge Exploration  
Beaver Creek Coal Company  
CEP/015/007  
Emery County, Utah

Doug Maier, Engineering Geologist and Sandy Pruitt of the Division inspected the Wildhorse Ridge exploration project with Jim Voorhees, Mine Engineer and Dick Robison, Project Engineer for the Wildhorse Development on October 20, 1982.

The inspection was conducted in response to notification from OSM that the U.S. Fish and Wildlife was concerned that Beaver Creek Coal Company had disturbed more riparian habitat and cut down more Ponderosa Pine trees than was absolutely necessary in construction of the exploration road.

On October 19, 1982, Mr. Clark Johnson of U.S. Fish and Wildlife was contacted regarding the complaint. In addition to excessive disturbance, he was of the opinion that DOGM and Beaver Creek Coal Company had not fully considered their recommendations based on the mine predesign consultation included in a letter dated August 5, 1982. DOGM did inform the company of these recommendations and they were reviewed prior to road development. Relocation of the road outside of the riparian region was determined cost prohibitive. As a result of the predesign consultation, the number of stream crossings was reduced to two and a switchback was deleted from the design. A one lane road was constructed for most of the route with two passing zones within the riparian region. A log retaining wall was constructed along the section of the road closest to the stream. Several dead snags were left intact along the stream course. The company committed to preserving as many old trees as possible. This inspector found that only two too many trees were cut down outside the roadway. The width of the road was not excessive, the extent of damage from the cut and fill development along the switchbacks was not unusual. Cross-culverts were installed at the drainages specified in the plan, rip-rap flexible downspouts are to be installed at discharge points. The roadway ditch drainages at the end of each switchback will be rip-rapped for erosion protection.

As the exploration road was permitted to meet Class III road requirements, the removal of topsoil was not mandated. With mine development the new road will be reclassified Class II and all retrievable topsoil (most of which is within the riparian zone) will be salvaged before the road is widened. The topsoil covered in the cut and fill development of the switchbacks and pad is irretrievable. The exploration plan committed to removing topsoil from the mine portal area onsite, the company maintains that topsoil was not salvagable from the drill site due to the steep terrain. Dick Robison explained that in

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developing the road and drill site they followed the coal seam and ended up above the bench area originally specified as the portal area, where a considerable amount of salvagable topsoil was available. There was no modification to the topsoil removal plan request of a variance to the removal requirements from steep slope terrain. Considering the shallow depth of the topsoil on the steep slopes and the small area affected, DOGM would probably have granted the variance to the removal requirements if requested. A technical violation exists in the company's failure to request a variance, but a citation is not fully warranted. However, any further infractions from approved plans or permit conditions, however minor, will warrant enforcement action toward Beaver Creek Coal Company, as the persistent disregard to required procedures will be evident.

The cross-culvert for Bear Creek appeared adequate, the earthen fill over the culvert should be seeded, a rock headwall may be determined necessary in the future.

Beaver Creek Coal Company posted a perimeter marker near Bear Creek at the land boundary (determined by the Bear Creek fault line) between Co-Op's Bear Creek Canyon operation and the Wildhorse Ridge development.

Interim revegetation of all side cast material along the road and pad should be initiated this month.

SANDY PRUITT  
FIELD SPECIALIST

SP/1m

cc: Tom Ehmett, OSM  
Dave Meyer, Beaver Creek Coal Company  
Clark Johnson, U.S. Fish and Wildlife  
Inspection Staff

Statistics:

See Gordon Creek #3 and #6 memo, dated November 1, 1982.